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December 9, 2019

VIA ECF

Magistrate Douglas E. Arpert, U.S.M.J.
United States District Court, District of
New Jersey
Clarkson S. Fisher Building and U.S.
Courthouse
402 East State Street
Trenton, NJ 08608

Re: Agudath Israel of America, et al. v. Township of Jackson, New Jersey, et al.
Case No. 3-17-cv-03226

Your Honor:

This firm represents the Plaintiffs, Agudath Israel of America and WR Property LLC, in the above-referenced matter. Please accept this letter as our discovery status report to be provided to the Court pursuant to the Court's Order of November 15, 2019. (Dkt. #67)

Pursuant to the Court's Order, the parties were to have served their mutual discovery responses and document productions by November 1, 2019. On October 25, 2019, counsel for Defendants wrote to the Court indicating that Defendants would not be able to comply with that deadline. (Dkt. #65.) The Court converted that letter to an Order indicating that the Defendants must begin service of discovery and document production on November 1, 2019 on a "rolling basis" with "substantial completion" by November 30, 2019.

Plaintiffs served their responses to Defendants' Interrogatories and Requests to Produce and also produced documents on November 1, 2019.

To date, Defendants have not served any answers to interrogatories, nor written responses to requests to produce. Plaintiffs cannot evaluate the documents that have been produced in a vacuum and must receive Defendants' discovery responses which were originally due November 1, 2019 and then November 30, 2019. There is a Telephone Status Call with your Honor scheduled for December 16, 2019 at 10:30 a.m.

Defendants did produce a very small number of documents, a total of 299 pages, on November 1, 2019. Additionally, on November 8, 2019, Defendants served Plaintiffs with the documents that were the subject of the spoliation motion before the Court together with a privilege log. Defendants served a large production of documents on December 2, 2019 and have represented that there will be additional productions on a rolling basis.

Thank you for your attention to this matter.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Sieglinde K. Rath', written in a cursive style.

Sieglinde K. Rath

cc: Counsel of record via ECF